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DELIVERY VIA ECF

Honorable Loretta A. Preska
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Defendant Ologbenla's application, on consent of the Government, to modify his voluntary surrender date to January 2, 2023 (or other date that week convenient to DOC and Probation) is granted.

SO ORDERED.

Re: **United States v. Lucas Ologbenla**
19 Cr. 00291 (LAP)

Loretta A. Preska
10/21/2022

Dear Judge Preska:

We write on behalf of our client, Lucas Ologbenla, regarding his voluntary surrender in the above-referenced matter. As the Court may recall, Mr. Ologbenla pleaded guilty to one count of conspiracy to commit wire fraud and was sentenced to one year and one day in prison on June 29, 2022. Mr. Ologbenla is set to surrender to FCI Allenwood Low Security prison on October 28, 2022. We respectfully request a brief delay in Mr. Ologbenla's voluntary surrender date until the week of January 2, 2023 for the reasons contained here. We have consulted with the government and they consent to the proposed modification of Mr. Ologbenla's surrender date.

Mr. Ologbenla and his wife, Virginia, have two very young daughters, who are one and three years old and require significant childcare at this stage of their lives. Lucas has been his family's sole provider of financial support and his impending incarceration will make it very difficult for his family to pay for basic necessities while he is in prison. Virginia is actively seeking part-time employment so that she may provide for their children while Lucas is incarcerated. Unfortunately, she has not yet obtained work yet but does hope to find employment as a home health aide within the next few weeks. We are hopeful that a modification to Mr. Ologbenla's surrender date will enable the Ologbenla's time to solidify their child care plans, as well as their finances. Additionally, it would be very meaningful for the Ologbenla family if he is able to spend the holiday season with his young children before his incarceration.

For these reasons, we respectfully request that Mr. Ologbenla's voluntary surrender date be delayed until the week of January 2, 2023.

Please do not hesitate to contact me if you have any questions.

Respectfully submitted,



/s/ Daniel Zelenko

Daniel Zelenko

CC: AUSA Daniel Wolf

AUSA Rebecca Dell